

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LING CAI, individually; SING XU, individually;
ZHIYUAN XU, a minor, by and through his
Natural Parent, JING XU; JENNIFER
EDWARDS, as Special Administrator of the
ESTATE OF ZHONGPING ZHOU, deceased;,

Plaintiffs,

v.

ENTERPRISE LEASING COMPANY-WEST
LLC dba ENTERPRISE/ELCO; ENTERPRISE
LEASING COMPANY-WEST LLC dba
ALAMO; ELCO ADMINISTRATIVE
SERVICES COMPANY; ACE AMERICAN
INSURANCE COMPANY; ESIS INC, dba
CHUBB NORTH AMERICAN CLAIMS;
CHUBB SERVICES CORPORATION dba
CHUBB NORTH AMERICAN CLAIMS;
CHUBB NATIONAL INSURANCE
COMPANY; AND CHUBB INDEMNITY
INSURANCE COMPANY; DOES 1 through X,
inclusive; and ROE CORPORATIONS I through
X, inclusive,

Defendants.

CASE NO.: 2:23-cv-00050-ART-NJK

ORDER APPROVING

**STIPULATION MODIFYING
BRIEFING SCHEDULE ON
DEFENDANTS' MOTIONS TO
DISMISS**

(Second Request)

1 All parties in this case, Plaintiffs Ling Cai, Sing Xu, Zhiyuan Xu, Jing Xu, Jennifer Edwards
2 as Special Administrator for Estate of Zhongping Zhou (collectively “Plaintiffs”); Enterprise
3 Leasing Company West LLC dba Enterprise Elco, Enterprise Leasing Company West, LLC dba
4 Alamo, Elco Administrative Services Company (collectively “Enterprise Defendants”); and Ace
5 American Insurance Company, ESIS INC, Chubb North American Claims, Chubb Services
6 Corporation dba Chubb North American Claims, Chubb National Insurance Company, Chubb
7 Indemnity Insurance Company (collectively “Ace Defendants”), by and through their undersigned
8 counsel, hereby stipulate that the briefing schedule regarding Defendants’ Motion to Dismiss. The
9 parties, through their undersigned counsel, hereby stipulate and agree as follows:

10 1. WHEREAS, on January 13, 2023, ACE Defendants filed their Motion to Dismiss
11 and on January 17, 2023, ENTERPRISE Defendants filed their Motion to Dismiss (“Motions”); the
12 hearings on Defendants’ Motions are not currently scheduled.

13 2. ACE Defendants and ENTERPRISE Defendants requested additional time to
14 prepare their replies to Plaintiffs’ Oppositions to the Motions due to timing issues and conflicts
15 with other matters.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

NOW, therefore, the parties hereby STIPULATE that Defendant ACE's reply to Plaintiffs' Opposition and Defendant ENTERPRISE's reply to Plaintiffs' Opposition will be due on February 17, 2023.

IT IS SO STIPULATED.

Dated: February 7, 2023

GREENBERG TRAURIG, LLP

CLYDE & CO US LLP

/s/ Bethany L. Rabe

/s/ Dylan Todd

Eric W. Swanis, Esq. (NV Bar 6840)
Bethany L. Rabe, Esq. (NV Bar 11691)
Jerrold L. Berrios, Esq. (NV Bar 15504)
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Email: swanise@gtlaw.com
rabe@gtlaw.com
berriosj@gtlaw.com

Amy M. Samberg (NV Bar No. 10212)
amy.samberg@clydeco.us
Dylan P. Todd (NV Bar No. 10456)
dylan.todd@cyldeco.us
7251 W. Lake Mead Blvd., Suite 430
Las Vegas NV 89128

*Attorneys for Defendant
ACE American Insurance Company*

*Counsel for Defendants Enterprise Leasing
Company-West LLC dba Enterprise/ELCO;
Enterprise Leasing Company-West LLC dba
ALAMO; and ELCO Administrative Services
Company*

THE 702 FIRM

/s/ Michael C. Kane

Bradley J. Meyers (NV Bar 8857)
Michael C. Kane (NV Bar 10096)
Sandra Duritza (NV Bar 15538)
8335 W. Flamingo Road
Las Vegas, NV 89147
E-Mail: service@the702firm.com
and

J. Amy Sun, Esq. (NV Bar 11289)
SUN LAW GROUP, LLC
6145 Spring Mountain Road, #201
Las Vegas, Nevada 89146

Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED this 8th day of February, 2023.



Anne R. Traum
United States District Court Judge